

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

XUE HUI ZHANG

Plaintiff

-against-

NOTICE OF MOTION

ICHIBAN GROUP LLC.,
ICHIBAN FOOD SERVICES INC.,
CHEN & JU, INC.
DAVID IP, SHIOW FEI JU,
SHIN SHII JU, CHWON TZU JU,
LIPING JU, TYNG QUA JU & TOMMY JU

CASE NO: 1:17-CV-148 [MAD/TWD]

Assigned:

Defendants,

SIRS/MESDAMES :

PLEASE TAKE NOTICE a motion pursuant to FRCP Rules 8, 11, 12 and NDNY Local Rule 7.1, will be made as set forth below:

JUDGE: Hon. Mae A. D'Agostino , District Court Judge

RETURN DATE/TIME: June 20, 2017 @ 10:00 AM or as soon thereafter as counsel may be heard

COURTHOUSE: United States District Court
James T. Foley Courthouse
445 Broadway
Albany, New York 12207

RELIEF REQUESTED: 1) An Order a) Dismissing pursuant to FRCP Rules 8, 12 and 56; b) Sanctioning Plaintiff and counsel pursuant to FRCP Rule 11 c) Awarding costs, disbursements and attorneys fees pursuant to 42 USC §1986); Granting such other and further relief as the Court deems just fair and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 7.1(b)(1) Answering papers are to be served and filed on or before June 3, 2017; Any reply must be served and filed on or before June 9, 2017.

Respectfully submitted

Date: May 11, 2017
LATHAM, NEW YORK

/s/ Matthew J. Mann
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Mann Law Firm P.C.
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